

## ETHICAL VALUES

TATMETAL, as one of Turkey's leading industrial companies has created this "Code of Ethical Conduct" guiding for valuable human resources located in Karadeniz Ereğli, Istanbul and Bursa locations. With the "Code of Ethical Conduct", the aim is to determine the behaviors and attitudes that TATMETAL employees should adopt within the framework of a strong corporate culture, in which all employees focus on honesty, respect, trust and fairness. If the "Code of Ethical Conduct" is adopted and implemented by all TATMETAL employees, sustainable individual and corporate reputation will be possible.

TATMETAL employees should benefit from the "Code of Ethical Conduct" in order to distinguish between right and wrong in communication and interaction with their environment while doing their job. The "Code of Ethical Conduct", in which the basic code of ethics and business ethics are combined, is determined by the "Ethics Committee" within TATMETAL. Our employees should report to the "Ethics Committee" any circumstances in which they feel indecisive and any issues they consider to be unethical. The most important point in this respect is to notify if there is any doubt that the rules have been violated. TATMETAL is also responsible for protecting every employee who expresses concern honestly and investigating a claim that is considered to be biased. The "Code of Ethical Conduct" has been prepared by considering business ethic rules and all individual, organizational and social processes. Our values have been gathered around the common mission and vision, and have been put forward by making them the basic items where all these processes are combined and intersected.



## OUR CODE OF ETHICAL CONDUCT

The Code of Ethical Conduct that TATMETAL employees must adopt is as follows.

### Our Basic Ethical Values;

- **Honesty and Respect:** TATMETAL employees are expected to be honest enough not to contradict their responsibilities during work and in their daily lives. Employees have to be respectful to all their managers, colleagues, business partners, customers, suppliers and all external stakeholders. Honesty, which reflects having personality traits such as sincerity, truthfulness and openness, enables us to respect the person directly in front of us and to be respected in return.
- **Trust and Fairness:** Compliance with rights, law, rules and standards should be one of the most important determinants of our principles in our work. TATMETAL employees should consult with their trusted institution and manager before evaluating themselves in terms of their colleagues by means of benchmarking. In order for the employees to establish and maintain healthy relationships; they need to provide confidence that they act in accordance with the rules and standards against their colleagues, managers, business partners, customers, suppliers and all external stakeholders.
- **Equality and Justice:** Commercial activities such as recruitment, promotion and remuneration of employees are carried out by TATMETAL regardless of race, color, language and religion. TATMETAL employees also pay attention to these issues in their duties, responsibilities and behavior towards their colleagues, managers, business partners, customers, suppliers and all external stakeholders.
- **Privacy and Confidentiality:** TATMETAL is committed to protecting the confidentiality of the personal and organizational information of its employees, managers, business partners, customers, suppliers and all external stakeholders. The collection, use, disclosure, storage, access and transfer of such information is carried out in accordance with the law. TATMETAL collects personal information fairly, legally and transparently and processes sufficient personal information only for its intended purpose. In line with the purpose for which it is processed, accurate, consistent, complete and up-to-date personal information is considered by TATMETAL. TATMETAL takes the necessary precautions to ensure that it works, protects and is not shared with third parties with the necessary working committees and personal laws regarding the protection of personal information in this regard. The employees of TATMETAL are also obliged to comply with the privacy and confidentiality rules by sharing to the extent authorized.

## 1- EMPLOYEES

In line with our company values, our employees;

1. Should know all the necessary information such as laws and regulations on issues related to their duties in detail and up-to-date, and they should take care to work within these frameworks.
2. Should not act contrary to general moral behavior within the company and outside the company by remembering that he/she represents the company.
3. Should follow and comply with the instructions, steps, application principles and similar notices issued or announced within the company regarding working conditions and discipline.

4. Should not engage in disturbing behaviors such as behavior, attitude, and threatening speech that will disrupt the efficiency and order of the working environment.
5. Should not express its political, social and religious views in a way that would disturb others in the work environment. However, they should be careful to use clothes suitable for workplace and work, avoiding the use of clothes and symbols that express religious or political meaning or social opinion.
6. They should definitely inform their Human Resources Department, such as disputes / lawsuits brought to judicial bodies, either because of their business relationship with customers and suppliers, or because of their personal problems with third parties and institutions.
7. Even if it can be evaluated within the scope of discrimination between men and women, language, religion and race, expressions and attitudes containing discrimination should not be shown in these areas.
8. Employees should perform their duties in the proper manner and in a moral, environmentally sensitive, ethical manner. Care must be given to all assets of the company, to protect them against possible losses and damages and to keep them within the company. Assets include goods, structures, installations, machinery, equipment, computers, information and also abstract concepts such as intellectual property, patents, know-how.
9. Any notices that do not comply with the ethical rules must be given with a clear identification and signature, and in special cases, verbal transfers can be made to the Ethics Committee.
10. Employees are expected to communicate and cooperate within the framework of mutual trust, respect and courtesy rules. As prudent employees, they should not engage in attitudes and behaviors that will lead to the cessation of communication, and approaches should be displayed in a way that encourages continuity.
11. Employees should not engage in business or business activities, either directly or indirectly, except for obtaining approval and information from the company's management and in matters that may require competition with the company. Apart from companies in which the company is a shareholder and in companies that are in the sector or which benefit the sector, he/she should not be a paid or unpaid board member or auditor without the approval of TATMETAL Board of Directors.
12. It is unacceptable for employees to destroy the official documents they have prepared while performing their duties. He/she must provide accurate and precise information and not provide incomplete or deliberate missing information and documents.

### 1.1.1 Information Privacy

Private trade secrets, financial information, manager, employee / customer information, all information compiled within the company, materials, programs and documents and all other software and hardware, agreements, contracts, products are confidential and owned by the company. It is forbidden to transfer any information belonging to the company, all natural or legal persons with whom the company has a customer relationship to third parties, to trade, to take the company and customer documentation out of the company by written or informatics.

### 1.1.2 Legal Responsibilities

Employees are obliged to present their work in accordance with the law, timely and comprehensible, in full. All activities and operations performed at home and abroad are carried out in accordance with the laws and regulations of our country/the countries. Company employees cannot make transactions and transactions against the Competition Rules and Law, which may affect pricing and marketing policies with competitors, could mean agreements, contracts and cooperation under no circumstances in the sector or similar fields of activity.

### 1.1.3 Conflicts of Interest

Company employees should not establish a sincere relationship that may cause conflicts of interest in their relations with authorized dealers and business partners, care should be taken to maintain the relationship at a business-oriented level, and should avoid exaggerated behavior, especially in social settings (such as food, travel) that may create a false or negative image without the knowledge of the company. Care must be taken that the persons who are in the company, wife and husband and / or close relatives (up to the third degree) are not in the same field of business or in the subordinate relationship, in case of this situation, the duty areas should be changed as soon as possible in order not to cause abuse or thought, and employees should show special sensitivity. It is forbidden for our employees to benefit directly or indirectly, or to promise to benefit others, by abusing their duties and powers or by any means, directly or indirectly.

### 1.1.4 Gift Acceptance Procedures and Principles

The basic principle is that employees do not accept cash or cash-like gifts that may affect their impartiality. However, in case of necessity, gifts whose maximum value does not exceed \$ 250 can be accepted as a prize with a symbolic value. It is unacceptable to create situations where bribery can be perceived, or to give or receive commissions. The company's assets and facilities cannot be used outside of the company's business without the benefit of the company. Likewise, donations and aids that are not approved by the Board of Directors cannot be made to organizations and individuals.

### 1.1.5 Protection of Company Equipment, Assets and Resources

Company employees should act in line with the principles of goodwill to protect company assets and equipment. In addition to considering the principles of saving in the use of assets, company employees should take care to protect them from theft, abuse and similar damages and not to use these assets for personal purposes. (Assets include goods, structures, installations, machinery, tools, equipment, computers, information systems, and all kinds of material assets, as well as abstract concepts such as intellectual property, all kinds of patents, ways of doing business.)

### 1.1.6 Media Relations, Advertising and Interviewing

Any interview and explanation request to be used in the media such as newspapers, magazines, television will be answered with texts in line with the company's communication and advertising strategies or by people to approve firstly by meeting with the General Manager of the Company and the Corporate Communication Unit. Employees are prohibited from making statements about the company, attending seminars, making a statement to the written, verbal, and visual media without the company's consent. At the same time, he/she cannot send articles, pictures using the title of the Company without approval. No comments, photos and declarations can be made in the social media environment and in the public opinion, taking into account the possibility of negatively affecting the reputation and corporate identity of the Company and its shareholders.

### 1.1.7 Legal Issues

In case the employees of the company are involved in any legal or official investigation, arrested or sentenced for any reason (to be heard as witness or as accused), they must first inform their managers and the Human Resources Department.

### 1.1.8 Executive Responsibilities

Managers with management responsibility are responsible for ensuring that the appropriate culture and working environment is created and maintained. They support employees to communicate questions, complaints and notices about the code of ethical conducts. They ensure that the business processes under their responsibility are structured in a way that minimizes the risks associated with ethical issues.

## 2-COMPANY

The company aims to be a symbol of reliability and respect for its employees, business partners, shareholders, suppliers, customers, competitors, environment and society. Honesty and trustworthiness are essential in dealing with employees and all stakeholders.

### 2.1 Responsibilities Against Shareholders

Critical information such as company financial statements, strategies, investments and risks, disclosures to shareholders are provided in a timely, accurate, complete and understandable manner. Aiming to maintain company values and maintain profitability, our Company implements value-creating strategies by avoiding unmanageable risks.

### 2.2 Responsibilities Against Employees

The company adopts the principle of keeping an equal distance to all employees and provides a safe and healthy working environment for its employees. It supports training for the development of employees' professional knowledge and skills as well as their personal competencies. Employees are treated honestly and fairly and with respect to their personal areas. Employees' rights are paid in a timely manner, in accordance with the principles set out in laws, regulations and implementation principles.

### 2.3 Occupational Health and Safety

The priority for the company in all circumstances is occupational health and safety. Acting in accordance with the occupational health and safety legislation within the company, necessary measures are taken. The principles of "preventive approach" and "continuous improvement" are applied on occupational health and safety. It provides necessary clothing and equipment related to business life. Health and safety measures are adapted to changing conditions and necessary trainings are given.

## 3- ETHICS COMMITTEE

### 3.1 Ethics Committee

The Ethics Committee is responsible for investigating and resolving complaints and notices of violations of the code of ethical conducts under TATMETAL Code of Business Ethics (TAT-ETHICS). The Ethics Committee, which is affiliated to the Chairman of the Board of Tat Metal, consists of persons in the following positions:

**President** – General Manager

**Member** - Director of Human Resources and Administrative Affairs

**Member** - Company Attorney

### 3.2 Working Principles of the Ethics Committee

Different managers may also enter this committee from time to time to apply for their knowledge. The director/ directors of the other department may be invited to the committee as temporary members. The Ethics Committee also examines and finalizes ethics violations involving employees except committee members. Ethics violations of employees, appeals to the decision of the Ethics Committee, are examined and concluded. Employees should contact the Ethics Committee when they encounter a hesitation and/or case regarding the Company's Ethical Values and Rules.

The Ethics Committee conducts its work within the framework of the following principles:

- It keeps the notifications and complaints and the identity of those who report or complain confidentially.
- It conducts the investigation under as many secret rules as possible.
- It has the authority to request information, documents and evidence related to the investigation directly from the existing department. It may examine any information and documents it has obtained, limited only to the subject of investigation.
- The investigation process is attached to the written report from the beginning. Information, evidence and documents are added to the minutes.
- The minutes are signed by the president and members.
- The investigation is handled in an urgent manner and the result is reached in the fastest possible way.
- Decisions taken by the board are implemented immediately.
- The relevant departments and authorities are informed about the outcome.
- The head of the Ethics Committee and its members act independently and unaffected by the department managers and the hierarchy within the organization, while performing their duties on this issue. No pressure or suggestion can be made to them about the issue.
- The committee may, if it deems necessary, seek expert opinion and benefit from experts by taking measures that do not violate confidentiality principles during the investigation.

Employees can provide information to the TATMETAL Ethics Committee e-mail address, etik@tatmetal.com.tr, or share the situation in writing to any of the members of the Committee.

The member who receives such information shall convene a meeting by informing the committee urgently if necessary. If employees act contrary to the principles related to Ethical Values, the provisions of "Disciplinary Practices" specified in the Human Resources Regulation shall be applied. If the complaint is related to one of the members of the Committee, the Ethics Committee convenes outside the member concerned.

### 3.3 Execution

The Human Resources and Administrative Affairs Directorate and the Ethics Committee are responsible for the proper processing and documentation of this process.